

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF MISSISSIPPI
OXFORD DIVISION**

UNITED STATES OF AMERICA

PLAINTIFF

vs.

CIVIL NO. 3:22CV154-DMB-RP

**ALL RIGHT, TITLE, AND INTEREST
IN 2021 POLARIS ATV VIN/SERIAL:
3NSPAL927MF146645**

DEFENDANTS

VERIFIED COMPLAINT FOR FORFEITURE IN REM

Comes now the United States of America, Plaintiff in the above styled cause, by and through its undersigned United States Attorney for the Northern District of Mississippi, and brings this Verified Complaint for Forfeiture In Rem and alleges as follows in accordance with Supplemental Rule G(2) of the Federal Rules of Civil Procedure:

Nature of the Action

1. This is an action to forfeit and condemn property to the United States pursuant to 18 U.S.C. §981 for violations of 18 U.S.C. § 1343 (wire fraud) and/or 18 U.S.C. § 1957 (money laundering).

The Defendant in Rem

2. The defendant property is specifically identified as follows:

2021 Polaris ATV VIN/SERIAL: 3NSPAL927MF146645

(hereinafter “the defendant property”)

Based on information and belief, the record owner of the defendant property is Jacoby Alexander.

3. The defendant property has not been seized. The United States will request that a Warrant of Arrest in rem issue to allow the United States to seize and retain possession of the defendant property.

Jurisdiction and Venue

4. This Court has jurisdiction over an action commenced by the United States under 28 U.S.C. § 1345, and over an action for forfeiture under 28 U.S.C. § 1355(a). This Court also has jurisdiction over this particular action under 18 U.S.C. §981.

5. This Court has in rem jurisdiction over the defendant property under 28 U.S.C. 1355(b)(1)(A).

6. Venue is proper in this district because the defendant property is located within this district and/or because the acts or omissions giving rise to the forfeiture occurred in this district.

Basis for Forfeiture

7. The defendant property is subject to forfeiture pursuant to 18 U.S.C. §981 because it constitutes real property that represents or is traceable to the gross receipts obtained, directly or indirectly, from violations of 18 U.S.C. § 1343 (wire fraud). Additionally, the property constitutes real property involved in a transaction or attempted transaction in violation of 18 U.S.C. § 1957 (money laundering).

Facts

8. Alexander and Sons, LLC, (“A&S”) is a registered business with the Mississippi Secretary of State with an effective date of February 15, 2021. Jacoby Alexander is listed as the Registered Agent and Manager for A&S.

9. A&S maintains an account at Regions Bank by and through Jacoby Alexander. The

account was opened on February 13, 2021. The A&S Regions Bank account received \$335,700.00 in Payroll Protection Program (“PPP”) loan and/or Economic Injury Disaster Loan (“EIDL”) funds via wire transfer from ReadyCap Lending, LLC (PPP Lender) on February 25, 2021.

10. These funds were received illegally, as this business was not in operation prior to February 15, 2020, which is the cutoff date to be eligible to receive the loan funds. Fraudulent bank statements, and other documents, were submitted to ReadyCap Lending, LLC on behalf of A&S to receive the loan proceeds.

11. The United States alleges that the defendant property was purchased, at least in part, with proceeds obtained as a result of a conspiracy to conduct a large-scale Paycheck Protection Program (PPP) and Economic Injury Disaster Loan (EIDL) scheme in the Northern District of Mississippi.

12. Based on the foregoing, Plaintiff alleges that the Defendant property identified herein is subject to forfeiture pursuant to 18 U.S.C. § 981.

13. That pursuant to the provisions of 18 U.S.C. § 981(f), all right, title and interest in the defendant property vested in the United States of America upon commission of the act giving rise to forfeiture.

WHEREFORE, Premises considered, Plaintiff prays as follows:

- (1) That a Warrant of Arrest in rem issue to allow the United States to seize and/or retain possession of the defendant property;
- (2) That notice issue according to the normal procedure of this Court and in accordance with 18 U.S.C § 983(a)(4)(A);
- (3) That judgment of forfeiture be decreed against the defendant property;

(4) That upon judgment of forfeiture, the United States be permitted to disposed of the defendant property in accordance with law;

(5) For costs and for such other further relief to which Plaintiff may be justly entitled

Respectfully submitted,

CLAY JOYNER
United States Attorney

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VERIFICATION

I, Cory Voce, hereby verify and declare under penalty of perjury that I am a Special Agent with the United States Secret Service (USSS), and that I have read the foregoing *Verified Complaint For Forfeiture In Rem* and know the contents thereof, and that the matters contained in the Verified Complaint are true to my own knowledge, except that those matters herein stated to be alleged on information and belief and as to those matters I believe them to be true.

The sources of my knowledge and information and the grounds of my belief are the official files and records of the United States, information supplied to me by other law enforcement officers, as well as my investigation of this case, together with others, as a Special Agent of the USSS.

I hereby verify and declare under penalty of perjury that the foregoing is true and correct.

Dated: July 21, 2022

/s/ CORY VOCE
CORY VOCE
Special Agent
USSS